



**Re: AIR TESTING IS GETTING SET UP .....**

**Gary Hale** to: Elizabeth Allen

08/19/2011 04:43 PM

Maya Gee, Stuart Turner, "ESSENEINFO@aol.com", Jae P  
Cc: DOUGLAS, Jan Wroncy, Karen BISHOP, Richard Kauffman,  
rkauffman, Scott Downey, Sheila Fleming, Eron king, Kay Morrison

All of the spray notices filed by the West Lane ODF office to date are listed by geographic area here:

<http://www.gaiavisions.org/notices/ODF/Reports/20110816/PlatBook/201178100001-PlatBook-4a-20110817.pdf>

The notice numbers for Weyerhaeuser fall spray in the following areas are:

T16S R7W (read as Township 16 South, Range 7 West)  
2011-781-00567  
2011-781-00571  
2011-781-00625

T16S R8W (read as Township 16 South, Range 8 West)

T17S R7W (read as Township 17 South, Range 7 West)  
2011-781-00567

T17S R8W (read as Township 17 South, Range 8 West)  
2011-781-00571  
2011-781-00572

The notices with spray maps and plans are here:

<http://www.gaiavisions.org/notices/ODF/2011-781-00567-Complete.pdf>  
<http://www.gaiavisions.org/notices/ODF/2011-781-00571-Complete.pdf>  
<http://www.gaiavisions.org/notices/ODF/2011-781-00572-Complete.pdf>  
<http://www.gaiavisions.org/notices/ODF/2011-781-00625-Complete.pdf>

Take care,

-Gary

Gary Hale (b) (6)  
Email: (b) (6)  
Web: (b) (6)  
Address: (b) (6)  
Phone/FAX: (b) (6)

On 08/19/2011 04:18 PM, Allen.Elizabeth@epamail.epa.gov wrote:

> Maya,  
>  
> I haven't seen a spray notification for 2011, but the notifications from  
> 2006-2010 are remarkably consistent in listing essentially the same 10  
> herbicides. From the information you've provided, it appears the  
> samples you're having collected will be analyzed using EPA Method TO-4A,  
> which also has the catchy title of "Determination of Pesticides and  
> Polychlorinated Biphenyls in Ambient Air Using High Volume Polyurethane  
> Foam (PUF) Sampling Followed by Gas Chromatographic/Multi-Detector  
> Detection (GC/MD)." Here are the herbicides listed in the  
> notifications:  
>  
> Atrazine

> Hexazinone  
> Imazapyr  
> Sulfometuron methyl  
> Metsulfuron methyl  
> 2,4-D  
> Clopyralid  
> Glyphosate  
> Triclopyr  
> Aminopyralid  
> Picloram  
>  
> Only atrazine and 2,4-D are on the analyte list for TO-4A, and I suspect  
> that no one single method can analyze for that entire list, though I'll  
> defer to our chemists. Richard forwarded the information from Air  
> Toxics. They are a very good lab, but the analyte list they provided  
> for TO-4A appears abbreviated. I've attached the table of target  
> analytes from EPA's documentation of the method description. Most of  
> the chemicals you'll see on that list are chlorinated insecticides. So  
> at this point, it appears that of the herbicides, only atrazine and  
> 2,4-D are detectable by Method TO-4A, unless Air Toxics has further  
> developed the method (Air Toxics is a very good lab). And from your  
> description of the spray notifications from Weyerhaeuser, they don't  
> intend to apply atrazine and 2,4-D.  
>  
> One other thing to consider. I've looked at a few studies designed to  
> characterize vapor concentrations of various pesticides in air at  
> locations not immediately adjacent to ongoing applications. They've  
> been detected, though the detections were typically in the very low  
> (i.e., less than 10) nanograms per cubic meter range. Unless active  
> spraying is occurring or has just taken place, it might be necessary to  
> obtain pretty low detection limits. One of the problems associated with  
> sampling for these herbicides is that they have fairly low vapor  
> pressures. That doesn't mean they don't volatilize, and that certain  
> conditions don't facilitate volatilization better than others, but at  
> typical equilibrium conditions, vapor-phase concentrations are likely  
> fairly low. We're looking at using samplers that contain a XAD resin  
> and can be left out for perhaps a month, in order to be able to measure  
> airborne concentrations that occur during not only during any spray  
> events, as well as what we expect to be lower concentrations in-between  
> sprays.  
>  
> We would be happy to have a phone call with you next week to discuss  
> some of the sampling issues with you. I don't mean to imply that EPA  
> would necessarily be able to use the data you collect in any official  
> manner, but we certainly are interested in ensuring that any data you  
> decide to collect is as usable for your purposes as it can be.  
>  
> Elizabeth  
> (See attached file: to-4ar2r 35.pdf)  
>  
> Elizabeth Allen  
> Risk Evaluation Unit , Office of Environmental Assessment  
> US Environmental Protection Agency, Region 10  
> 1200 Sixth Ave, Suite 900  
> Seattle, WA 98101  
>  
> 206-553-1807  
> allen.elizabeth@epa.gov  
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